

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RICHARD WAYNE WRIGHT, Sr.,
Plaintiff,

Vs.

Case #2:05-CV-439-A

SYLVESTER NETTLES, et al.,
Defendants.

MOTION TO SUPPLEMENT SPECIAL REPORT

FILED BY WILLIAM SEGREST ON 9-27-05

COMES NOW William Segrest, Executive Director for the Alabama Board of Pardons & Paroles, represented by the undersigned counsel, shows unto the Court as follows:


1. On 9-27-05, Defendant William Segrest filed a Special Report, but did not attach his affidavit to the Special Report.

2. Defendant William Segrest respectfully requests that the above-mentioned Special Report be supplemented with the attached affidavit.

Respectfully submitted,
TROY KING
ATTORNEY GENERAL

GREGORY O. GRIFFIN, SR.
CHIEF COUNSEL

s/STEVEN M. SIRMON
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s/HUGH DAVIS
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CERTIFICATE OF SERVICE

I hereby certify that on 9-29-05, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Gregory Marion Biggs and William Richard Lunsford, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

**RICHARD WAYNE WRIGHT, SR.
AIS# 187140
VENTRESS CF
P.O. BOX 767
CLAYTON, AL 36016**

Done this 29th day of September, 2005.

Respectfully submitted,



s/ STEVEN M. SIRMON
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**STATE OF ALABAMA
MONTGOMERY COUNTY**

AFFIDAVIT


Before me, the undersigned authority, personally appeared William Segrest, who is know to me, and after being duly sworn, deposed and said as follows:

"My name is William Segrest. I am employed by the Alabama Board of Pardons & Paroles as its Executive Director. Among my other duties, I supervise the Probation & Parole Officers who manage the various divisions of the agency; I serve as custodian of the agency's records; and I certify the official acts of the Board. I do not have a vote in the decision to grant or deny parole. By statute, that power is vested solely in the Board.

"Carolyn Miles-Pruitt is a retired probation & parole officer, formerly employed by the Alabama Board of Pardons & Paroles. This action arises from a report she submitted in 1996, when she was employed in that capacity. That report contains a detailed description of the prosecution's version of the offenses and surrounding circumstances. That report also contains a statement by Wright regarding the offenses.

"Wright has previously challenged the content of that report in court. He has also had numerous opportunities to explain his position to the Board through letters.

"I am prohibited by statute from producing a copy of any document in the Board's files."


William Segrest

Sworn to & subscribed before me this 29th day of September, 2005.

